

MATTHEW K. EDLING (SBN 250940)

matt@sheredling.com

TIMOTHY R. SLOANE (SBN 292864)

tim@sheredling.com

SHER EDLING LLP

100 Montgomery St., Suite 1410

San Francisco, CA 94104

Tel: (628) 231-2500

Fax: (628) 231-2929

*Attorneys for Plaintiffs ALISU INVESTMENTS, LTD.,
and KARGO GROUP GP, LLC*

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ALISU INVESTMENTS, LTD. and
KARGO GROUP GP, LLC,

Plaintiffs,

v.

TRIMAS CORPORATION d/b/a/ NI
INDUSTRIES, INC.; BRADFORD
WHITE CORPORATION; LUPPE
RIDGWAY LUPPEN; PAULA BUSCH
LUPPEN; METAL PRODUCTS
ENGINEERING; DEUTSCH/SDL,
LTD.; RHEEM MANUFACTURING
COMPANY; and INFINITY
HOLDINGS, LLC,

Defendants.

AND ALL COUNTERCLAIMS

Case No. 2:16-CV-00686 MWF (PJWx)

Honorable Michael W. Fitzgerald

**JOINT STATUS REPORT AND
REQUEST FOR TRIAL SETTING
ORDER**

JOINT STATUS REPORT

Plaintiffs Alisu Investments, Ltd. and Kargo Group GP, LLC (collectively “Plaintiffs”) and Defendant Bradford White Corp. (“Bradford”), hereby submit this Joint Status Report and proposed revised trial schedule pursuant to the Court’s November 8, 2023 Order (Dkt No. 346).

Since the last update submitted to the Court, the remaining parties – Plaintiffs and Bradford (collectively, the “Parties”) – have continued to engage in good faith settlement discussions but have not yet been able to reach a resolution.

Plaintiffs and Bradford still desire to resolve this dispute through settlement but, given the time that has lapsed and the expiration of the litigation stay on February 7, 2024, the Parties request that the Court set this case for trial on a reasonable schedule to allow the Parties to attempt to reach a settlement and prepare for trial if necessary. As such, the Parties respectfully submit and request the Court issue an order with deadlines as follows:

- The Parties shall designate their expert witnesses, and make the required disclosures, by no later than March 15, 2024;
- The Parties shall designate and disclose any rebuttal expert witnesses by April 12, 2024;
- All expert discovery shall be completed by May 22, 2024;
- The last day to file motions shall be June 21, 2024;
- Pursuant to Local Rule 16-15, the Parties have participated and elect to continue their participation in an ongoing private dispute resolution proceeding, and such proceeding shall be completed by July 19, 2024;
- The Parties shall file their respective Memorandum of Contentions of Fact and Law, Exhibit and Witness Lists, Status Report regarding settlement, and all Motions in Limine by August 22, 2024;
- The Parties shall lodge Pretrial Conference Order, file agreed set of Jury Instructions and Verdict forms, file statement regarding Disputed

Instructions and Verdict forms, and file any oppositions thereto by
September 13, 2024;

- Final Pretrial Conference and Hearing on Motions in Limine to be held
in October, 2024; and
- Trial Date (Est. 3-5 Days) to start on November __, 2024.

Respectfully submitted,

Dated: February 14, 2024

SHER EDLING LLP

By: /s/ Matthew K. Edling

Matthew K. Edling

*Attorneys for Plaintiffs ALISU
INVESTMENTS, LTD, and KARGO GROUP
GP, LLC*

Dated: February 14, 2024

**ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP**

By: /s/ Tim C. Hsu

John J. Allen
Tim C. Hsu

*Attorneys for Defendant Bradford White
Corporation*

ECF CERTIFICATION

I, Matthew K. Edling, in compliance with Civil Local Rule 5-4.3.4(a)(2)(i),
hereby attest that the above-named counsel has concurred in this filing.